

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

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**The Western Massachusetts Electric  
Company**

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**D.T.E. 04-40/04-109/05-10**

**ATTORNEY GENERAL'S FIRST SET OF  
DOCUMENT AND INFORMATION REQUESTS TO THE WESTERN  
MASSACHUSETTS ELECTRIC COMPANY**

- AG 1-1      Please provide copies of the Western Massachusetts Electric Company FERC Form 1 for 2003 and 2004.
- AG 1-2      Please provide the Annual Report Western Massachusetts Electric Company for 2003 and 2004.
- AG 1-3      For each redacted page in Exhibit MJM-3, please provide the pages in their un-redacted versions.
- AG 1-4      Referring to Exhibit MJM-3, Page 1, please provide calculations supporting the Carrying Costs for 1998-2003 and 2004.
- AG 1-5      Referring to Exhibit MJM-3, Page 2, please provide workpapers and calculations supporting the amortization for 2003 and 2004 in Column C.
- AG 1-6      Referring to Exhibit MJM-3, Page 3, please provide workpapers, supporting documentation, and calculations for the entry in Column G for 2004.
- AG 1-7      Referring to Exhibit MJM-3, Page 3, please provide workpapers, supporting documentation, and calculations for the entry in Column H for 2003.
- AG 1-8      Referring to Exhibit MJM-3, Page 7, please provide supporting workpapers and calculations for the interest on spent nuclear fuel in 2003 and 2004.
- AG 1-9      Referring to Exhibit MJM-3, Page 8, please provide supporting documentation for the actual decommissioning costs for 2003 and 2004.

- AG 1-10 Referring to Exhibit MJM-3, Page 9, please provide supporting documentation and workpapers for the costs for each item in 2003 and 2004.
- AG 1-11 Referring to Exhibit MJM-3, Page 10, please provide supporting documentation and workpapers for the market value for each item in 2003 and 2004.
- AG 1-12 Referring to Exhibit MJM-3, Page 12, please provide supporting documentation and workpapers for the FAS 109 in Column C(2) and the FAS 109 Gross-up in Column C(3) for 2003 and 2004.
- AG 1-13 Referring to Exhibit MJM-3, Page 12A, please provide supporting documentation and workpapers for the capital structure and fixed cost rates for 2003 and 2004.
- AG 1-14 Referring to Mahoney testimony, page 14, lines 7-16, please provide documentation and calculations supporting the payments of the FAS 109 liabilities associated with sale of facilities and resulting establishment of the “decelerated FAS 109” earning a return at the cost of capital.
- AG 1-15 Referring to MJM-4, Page 1, please explain the reason for the increase in NU Tariff Expenses from 2003 to 2004.
- AG 1-16 Referring to Mahoney testimony, Page 21, lines 16-20, please describe the changes in operating procedures that led to the major increases in NOATT Schedule 2 charges.
- AG 1-17 Referring to Exhibit RAB-1, Page 2, please provide supporting documentation for the unbilled revenue in Column (d).
- AG 1-18 Referring to Exhibit RAB-1, Page 3, please provide the authorization to include Generation Information Systems Costs and Consulting Costs on 2003 RFP in the SOS expense.
- AG 1-19 Referring to Exhibit RAB-1, Page 3, please provide supporting documentation for the Generation Information Systems Costs in October 2002.
- AG 1-20 Referring to Exhibit RAB-4, Page 2, please provide supporting documentation for the unbilled revenue in Column (b).
- AG 1-21 Referring to Exhibit RAB-4, Page 3, please provide the authorization to include Consulting Costs on 2003 RFP in the DS expense.

- AG 1-22 Referring to Exhibit RAB-7, Page 2, please provide supporting documentation for the unbilled revenue in Column (d).
- AG 1-23 Referring to Exhibit RAB-7, Page 3, please provide authorization to include the Legal Costs on SOS/DS Litigation in SOS expense.
- AG 1-24 Referring to Exhibit RAB-7, Page 3, please provide supporting documentation for the Legal Costs on SOS/DS Litigation in January 2003.
- AG 1-25 Referring to Exhibit RAB-9, Page 2, please provide supporting documentation for the unbilled revenue in Column (b).
- AG 1-26 Referring to Exhibit RAB-9, Page 3, please provide supporting documentation for the Legal Costs on SOS/DS Litigation April through November 2004.
- AG 1-27 Referring to Exhibit RAB-12, Page 2, please provide supporting documentation for the unbilled revenue in Column (b).
- AG 1-28 Referring to Exhibit RAB-12, Page 3, please provide authorization to include the Legal Costs on SOS/DS Litigation in DS expense.
- AG 1-29 Referring to Exhibit RAB-12, Page 3, please provide supporting documentation for the Legal Costs on SOS/DS Litigation January 2003.
- AG 1-30 Referring to Exhibit RAB-13, Page 2, please provide supporting documentation for the unbilled revenue in Column (b).
- AG 1-31 Referring to Exhibit RAB-13, Page 3, please provide supporting documentation for the Consulting Costs on RFP in June, September, and December 2004.
- AG 1-32 Referring to Exhibit RAB-13, Page 3, please provide supporting documentation for the Legal Costs on SOS/DS Litigation in September 2004.
- AG 1-33 Please provide the balances of unbilled SOS and DS revenue as of February 28, 2005 and the proposed disposition of those balances.
- AG 1-34 Please provide the dollar amount included in bills rendered after February 28, 2005 applicable to SOS rendered prior to March 1, 2005.

May 5, 2005